

Re: RM-11306

Summary

I support the adoption of RM-11306 with the addition of by-emission-type allocations on the 160-Meter (1.8 – 2.0 MHz) Amateur band.

Discussion

Propagation conditions and the physically large receiving and transmitting antennas required on 160 meters place most signal levels at or slightly above ambient noise levels. To minimize interference, the 160-Meter band requires regulated segments be set aside for narrowband weak-signal operation. The 3.5-kHz maximum bandwidth across 160 meters as proposed by ARRL should be modified to accord with existing IARU bandplans as given in **Table 1**.

Conclusion

The FCC should implement the proposed changes to 47 C.F.R. §97 regulations as proposed by RM-11306 *with the following change*:

Establish a narrow bandwidth segment on the 160-Meter band consistent with and compatible with the narrow bandwidth segments established in IARU Regions 1, 2, & 3.

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Spectrum Utilization Plans ¹	Frequency Segment (kHz)	Maximum Bandwidth ²	Remarks
IARU Region 1 Band Plan	1800 – 1838 1838 – 1840 1840 · 1842 1842 · 2000	200 Hz 500 Hz 2.7 kHz 2.7 kHz	CW Digimode except packet ³ , CW Digimode except packet, phone ⁴ , CW Phone, CW
IARU Region 2 Band Plan	1800 – 1840 1840 · 2000	CW, digimode Phone, CW	Band plan specifies mode rather than maximum bandwidth.
IARU Region 3 Band Plan	1800 – 1840 1840 · 2000	CW, RTTY Phone, CW	Band plan specifies mode rather than maximum bandwidth.

Table 1

¹ IARU band plans may be viewed at: <http://www.iaru-r1.org>. The ARRL band plans are available at: <http://www.arrl.org/FandES/field/regulations/bandplan.html>.

² Maximum bandwidth in IARU band plans is currently specified as a frequency (in Hz or kHz) in Region 1 only.

³ Packet radio is not allowed on the 1.8, 7, and 10 MHz bands in Region 1.

⁴ Band plan states: “*Those societies which have SSB allocation below 1840 kHz may continue to use it, but they are requested to take all necessary steps with their license administrations to adjust the phone allocations in accordance with the Region 1 Bandplan*”.